

FRANK LLP
ATTORNEYS AT LAW

305 BROADWAY
SUITE 700
NEW YORK, NY 10017
212 682 1853
212 682 1892 FAX
gfrank@frankllp.com
www.frankllp.com

Mar. 29, 2022

VIA ECF

Hon. Barbara Moses, U.S.M.J.
United States District Court
Southern District of New York
500 Pearl St., Room 740
New York, NY 10007

Re: *Michelo et al. v. Nat'l Collegiate Student Loan Trust 2007-2 et al.*, 18-CV-1781
Bifulco et al. v. Nat'l Collegiate Student Loan Trust 2004-2 et al., 18-CV-7692

Dear Judge Moses:

We represent Plaintiffs in the above-referenced cases. Pursuant to Part III of the Court's Individual Rules of Practice for Civil Cases, Plaintiffs request permission to file a document under seal in connection with their renewed Motion for Sanctions against TSI concerning Employee A. The document is Exhibit D to the Asher Hawkins Declaration in support of this Motion.

The document in question, a redacted copy of which has been filed at Dkt. No. 367-4 in Case No. 18-cv-1781, contains confidential private information concerning Plaintiff Tabar and/or a Class member in the instant litigation, and also shows the name of Employee A.

Plaintiffs are now filing an unredacted copy of the document, under seal.

Plaintiffs therefore request that the unredacted copy of the document remain under seal per Your Honor's Individual Rules.

Respectfully submitted,

/s/ Gregory A. Frank

cc: all counsel (via ECF)